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Attorneys for Individual and Representative  
Plaintiff RICHARD ZICCARELLO

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

RICHARD ZICCARELLO, on behalf  
of himself and all others similarly  
situated,

Plaintiffs,

vs.

SANYO ENERGY (U.S.A.)  
CORPORATION; SANYO NORTH  
AMERICA CORPORATION;  
PANASONIC CORPORATION OF  
NORTH AMERICA; and DOES 1-  
20, inclusive,

Defendants.

Case No. 2:19-CV-16623-CLW

**PLAINTIFF'S NOTICE OF MOTION  
AND MOTION FOR AN AWARD OF  
ATTORNEYS' FEES,  
REIMBURSEMENT OF EXPENSES,  
AND PAYMENT OF SERVICE  
AWARD**

**FINAL APPROVAL**

**HEARING: July 8, 2021**

The Honorable Cathy L. Waldor

TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on July 8, 2021 before the Honorable Cathy L. Waldor in the above-entitled Court, Class Counsel will move and hereby do move the Court for orders: (1) awarding Class Counsel attorney fees of \$1,672,265.03; (2) awarding Class Counsel \$72,734.97 as reimbursement of out-of-pocket costs and expenses incurred in prosecuting the litigation; for a total of \$1,745,000.00 and (3) awarding Class Representative Richard Ziccarello an incentive award in the amount of \$5,000.00.

The motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities in support thereof, the Joint Motion for final approval, the Settlement Agreement, the Declarations of David M. Birka-White, John D. Green, Charles E. Schaffer and Richard Ziccarello filed in support of the motion for final approval and the Declaration of Jeanne C. Finegan Concerning Implementation of Class Member Notification, the argument of counsel, and all pleadings and records on file in this matter.

Accordingly, Plaintiffs respectfully request that this motion be granted and that the Court approve and enter the proposed form of Order that is contemporaneously submitted herewith.

DATED: June 10, 2021

Respectfully submitted,

**BIRKA-WHITE LAW OFFICES**

By: /s/ David M. Birka-White

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